

FILED

08 AUG 27 PM 3:31

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

June 2008 Grand Jury

08 CR 2874 H

UNITED STATES OF AMERICA,) Criminal Case No. _____
Plaintiff,)
v.)
FRANCISCO JAVIER) Title 18, U.S.C., 371 -
TRAPERO-FELIX (1),) Conspiracy; Title 8, U.S.C.,
FRANCISCO JAVIER) Sec. 1324(a)(2)(B)(ii) -
TRAPERO-OLGUIN (2),) Conspiracy to Bring in Illegal
JUAN MANUEL SUAZO-MARTINEZ (3),) Aliens for Financial Gain;
Defendants.) Title 8, U.S.C.,
) Sec. 1324(a)(2)(B)(ii) -
) Bringing in Illegal Aliens for
) Financial Gain; Title 18, U.S.C.,
) Sec. 2 - Aiding and Abetting;
) Title 8, U.S.C.,
) Secs. 1324(a)(1)(A)(ii) and
) (v)(II) - Transportation of
) Illegal Aliens and Aiding and
) Abetting; Title 8, U.S.C.,
) Secs. 1326(a) and (b) - Deported
) Alien Found in the United States

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including August 15, 2008, within the Southern District of California, and elsewhere, defendants FRANCISCO JAVIER TRAPERO-FELIX, FRANCISCO JAVIER TRAPERO-OLGUIN, and JUAN MANUEL SUAZO-MARTINEZ, with the intent to violate the immigration laws of the United States, did knowingly and intentionally conspire together and with each other and with other persons unknown to the grand jury, to bring illegal aliens

SLF:fer:San Diego
8/27/08

1 into the United States for the purpose of commercial advantage and
2 private financial gain; in violation of Title 8, United States Code,
3 Section 1324(a)(2)(B)(ii), and Title 18, United States Code,
4 Section 371.

5 OVERT ACTS

6 In furtherance of said conspiracy and to effect and accomplish
7 the objects thereof, the following overt acts, among others, were
8 committed within the Southern District of California, and elsewhere:

- 9 1. On or about August 13, 2008, defendants FRANCISCO JAVIER
10 TRAPERO-FELIX and FRANCISCO JAVIER TRAPERO-OLGUIN
11 transported Rogaciano Melgarejo-Rosas from Mexico into the
12 United States via boat.
- 13 2. On or about August 14, 2008, defendants FRANCISCO JAVIER
14 TRAPERO-FELIX, FRANCISCO JAVIER TRAPERO-OLGUIN, and JUAN
15 MANUEL SUAZO-MARTINEZ met a group of Mexican citizens who
16 lacked permission to enter or remain into the United States
17 at a beach near Rosarito, Baja California, and loaded them
18 into two boats, which then put out to sea.
- 19 3. On or about August 15, 2008, the defendants consolidated
20 the passengers in the two boats into the boat driven by
21 defendant FRANCISCO JAVIER TRAPERO-FELIX and manned by
22 FRANCISCO JAVIER TRAPERO-OLGUIN, and JUAN MANUEL SUAZO-
23 MARTINEZ. Defendants then transported the Mexican citizens
24 who lacked permission to enter or remain into the United
25 States into the United States.

26 All in violation of Title 18, United States Code, Section 371.

27 //

28 //

Count 2

On or about August 15, 2008, within the Southern District of California, defendants FRANCISCO JAVIER TRAPERO-FELIX, FRANCISCO JAVIER TRAPERO-OLGUIN, and JUAN MANUEL SUAZO-MARTINEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Rogaciano Melgarejo-Rosas, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 3

On or about August 15, 2008, within the Southern District of California, defendants FRANCISCO JAVIER TRAPERO-FELIX, FRANCISCO JAVIER TRAPERO-OLGUIN, and JUAN MANUEL SUAZO-MARTINEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Rogaciano Melgarejo-Rosas, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 4

On or about August 15, 2008, within the Southern District of California, defendants FRANCISCO JAVIER TRAPERO-FELIX, FRANCISCO JAVIER TRAPERO-OLGUIN, and JUAN MANUEL SUAZO-MARTINEZ, with the intent to violate the immigration laws of the United States, knowing and in

1 reckless disregard of the fact that an alien, namely, Chrisoforo
2 Ortega-Espinoza, had not received prior official authorization to come
3 to, enter and reside in the United States, did bring to the United
4 States said alien for the purpose of commercial advantage and private
5 financial gain; in violation of Title 8, United States Code,
6 Section 1324(a)(2)(B)(ii), and Title 18, United States Code,
7 Section 2.

8 Count 5

9 On or about August 15, 2008, within the Southern District of
10 California, defendants FRANCISCO JAVIER TRAPERO-FELIX, FRANCISCO
11 JAVIER TRAPERO-OLGUIN, and JUAN MANUEL SUAZO-MARTINEZ, with the intent
12 to violate the immigration laws of the United States, knowing and in
13 reckless disregard of the fact that an alien, namely, Chrisoforo
14 Ortega-Espinoza, had come to, entered and remained in the United
15 States in violation of law, did transport and move said alien within
16 the United States in furtherance of such violation of law; in
17 violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii)
18 and (v)(II).

19 Count 6

20 On or about August 15, 2008, within the Southern District of
21 California, defendants FRANCISCO JAVIER TRAPERO-FELIX, FRANCISCO
22 JAVIER TRAPERO-OLGUIN, and JUAN MANUEL SUAZO-MARTINEZ, with the intent
23 to violate the immigration laws of the United States, knowing and in
24 reckless disregard of the fact that an alien, namely, Godofredo
25 Barrales-Velles, had not received prior official authorization to come
26 to, enter and reside in the United States, did bring to the United
27 States said alien for the purpose of commercial advantage and private

28 //

1 financial gain; in violation of Title 8, United States Code,
2 Section 1324(a)(2)(B)(ii), and Title 18, United States Code,
3 Section 2.

4 Count 7

5 On or about August 15, 2008, within the Southern District of
6 California, defendants FRANCISCO JAVIER TRAPERO-FELIX, FRANCISCO
7 JAVIER TRAPERO-OLGUIN, and JUAN MANUEL SUAZO-MARTINEZ, with the intent
8 to violate the immigration laws of the United States, knowing and in
9 reckless disregard of the fact that an alien, namely, Godofredo
10 Barrales-Velles, had come to, entered and remained in the United
11 States in violation of law, did transport and move said alien within
12 the United States in furtherance of such violation of law; in
13 violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii)
14 and (v)(II).

15 Count 8

16 On or about August 15, 2008, within the Southern District of
17 California, defendant JUAN MANUEL SUAZO-MARTINEZ, an alien, who
18 previously had been excluded, deported and removed from the United
19 States to Mexico, was found in the United States, without the Attorney
20 General of the United States or his designated successor, the
21 Secretary of the Department of Homeland Security (Title 6, United
22 States Code, Sections 202(3) and (4), and 557), having expressly
23 consented to the defendant's reapplication for admission into the
24 United States; in violation of Title 8, United States Code,
25 Sections 1326(a) and (b).

26 //

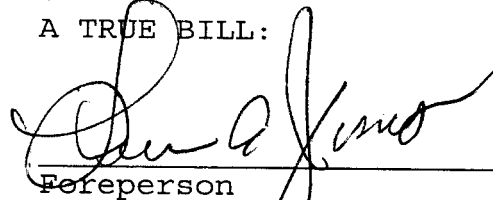
27 //

28 //


1 It is further alleged that defendant JUAN MANUEL SUAZO-MARTINEZ
2 was removed from the United States subsequent to September 14, 2001.

3 DATED: August 27, 2008.

4 A TRUE BILL:

5 
6 Foreperson

7 KAREN P. HEWITT
8 United States Attorney

9 
10 By: Sabrina L. Feve
11 SABRINA L. FEVE
12 Assistant U.S. Attorney
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28